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2007 JUN -8 AM 10:34

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June 7, 2007

Tracey Ligon
Office of the General Counsel
Federal Elections Commission
999 E. St. N.W.
Washington, DC 20463
Overnight Courier .

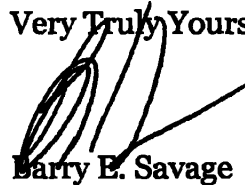
Re: MUR 5871

Dear Ms. Ligon:

With reference to the above matter the written responses of my clients Joseph Perz, Sally Perz, Allison Perz and William McElheney to the Factual and Legal Analysis served upon them.

We request that the further proceedings in this matter be by Pre Probably Cause Conciliation.

Very Truly Yours



Barry E. Savage

cc Joseph & Sally Perz
Allsion Perz and William McElheney

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2007 JUN -8 P 2:16

28044211004

Before the Federal Elections Commission

In the Matter of:

Joseph Perz

MUR 5871

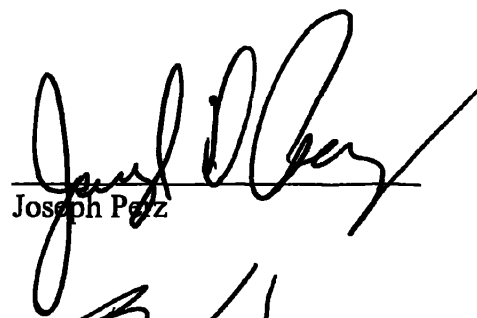
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2007 JUN - 8 P 3:52

Response of Joseph Perz

- 1, I have reviewed the Factual and Legal Analysis received from the FEC in this matter
- 2, I acknowledge that I did attend the campaign luncheon for Bush-Cheney '04 in Columbus, Ohio in 2004.
- 3, Arrangements to attend the campaign luncheon were made by my wife Sally Perz.
- 4, I had no dealings with Mr. Noe in regard to such arrangements.
- 5, I was mistakenly under the impression that any arrangements to attend the campaign luncheon with Mr. Noe was really as an inducement for people to attend.
- 6, At the time of my attendance I was not aware that a payment by Mr. Noe on behalf of my wife and myself was illegal and not aware that there was a limitation on contributions to federal presidential campaigns.
- 7, My wife had indicated to me that she considered the money provided to her by Mr. Noe as an obligation to repaid at a future date.
- 8, If I had been aware that it was illegal for monies accepted on my behalf to attend the campaign luncheon I would not have I attended the campaign luncheon.
- 9, I am aware that my wife, prior to any knowledge of an investigation, had repaid the monies to Mr. Noe.
- 10, For the reasons stated I deny that I knowingly and willfully violated the federal statutes and regulations cited in the Factual and Legal Analysis.

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A handwritten signature in black ink, appearing to read 'Joseph Perz', written over a horizontal line.

Joseph Perz

A handwritten signature in black ink, appearing to read 'Barry E. Savage', written over a horizontal line.

Barry E. Savage
Attorney for Joseph Perz

28044211006

Before the Federal Elections Commission

In the Matter of:

MUR 5871

Sally A. Perz

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2007 JUN -8 P 3:52

Response of Sally A. Perz

1, I have reviewed the Factual and Legal Analysis received from the FEC in this matter

2, I acknowledge that I did attend the campaign luncheon for Bush-Cheney '04 in Columbus, Ohio in 2004.

3, I acknowledge that monies were provided by Mr. Noe to me to make a contribution to Bush-Cheney 04 to attend the luncheon. I considered the monies advanced by Mr. Noe an "obligation " which I intended to repay at a later date and did in fact repay the monies and at the time of payment and had no knowledge of any investigation being made in the matter by law enforcement authorities, a copy of the check is attached and marked Exhibit A.

The Factual and Legal Analysis does not recite anything in regard to the foregoing.

5, I was mistakenly under the impression that any financial arrangements to attend the campaign luncheon made with Mr. Noe was really as an inducement for people to attend.

6, At the time of my attendance I was not aware that a payment by Mr. Noe on behalf of my husband and myself was illegal and not aware that there was a limitation on contributions to federal presidential campaigns by individuals.

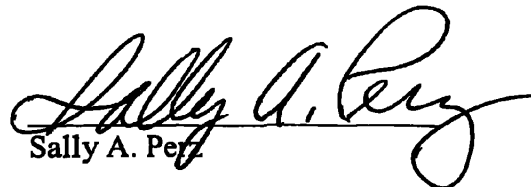
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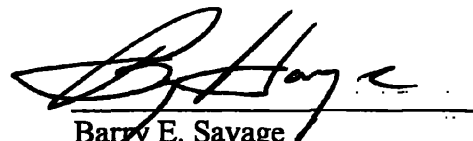
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7, If I had been aware that it was illegal for monies accepted on my behalf to attend the campaign luncheon I would not have I attended the campaign luncheon nor participated in the contribution to Bush Cheney '04.

8, Investigations by the FBI and statements made by me to the FBI and before a grand jury proceeding conducted in the United States District Court for the Northern District of Ohio regarding this matter were based on a grant of immunity where I have testified fully and completely and at no time did I invoke any 5th amendments rights.

9, For the reasons stated I deny that I "knowingly and willfully" violated the federal statutes and regulations cited in the Factual and Legal Analysis however, I do acknowledge that the acceptance of monies from Mr. Noe, although later repaid can be construed as a violation of the statues and regulation cited.


Sally A. Perz


Barry E. Savage
Attorney for Sally A. Perz

Before the Federal Elections Commission

In the Matter of:

Allison M. Perz

MUR 5871

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2007 JUN - 8 P 3 52

Response of Allison Perz

- 1, I have reviewed the Factual and Legal Analysis received from the FEC in this matter
- 2, I acknowledge that I did attend the campaign luncheon for Bush-Cheney '04 in Columbus, Ohio in 2004.
- 3, I acknowledge that monies were provided by Mr. Noe to me to make a contribution to Bush-Cheney 04 to attend the luncheon along with my husband William J. McElheney.
- 4, I was mistakenly under the impression that any financial arrangements to attend the campaign luncheon made with Mr. Noe was really as an inducement for people to attend and Mr. Noe stated that he wanted to enable me to attend.
- 5, At the time of my attendance I was not aware that a payment by Mr. Noe on behalf of my husband and myself was illegal and not aware that there was a limitation on contributions to federal presidential campaigns by individuals.
- 6, If I had been aware that it was illegal for monies accepted by me from Mr. Noe to attend the campaign luncheon I would not have I attended the campaign luncheon nor participated in the contribution to Bush Cheney '04.
- 7, Investigations by the FBI and statements made by me to the FBI and before a grand

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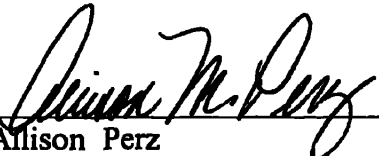
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jury proceeding conducted in the United States District Court for the Northern District of Ohio regarding this matter were based on a grant of immunity where I have testified fully and completely and at no time did I invoke any 5th amendments rights.

8, The only knowledge I have as to the money being treated as a "loan" was a voicemail left by Mr. Noe at the commencement of the investigation by the FBI to state that the money was a "loan" if asked about it. My attorney contacted the FBI regarding this conversation and I provided to the agent the voicemail containing Mr. Noe's statement to this effect. I have never made a statement that the money was a "loan."

9, I now fully understand the limitation on contributions to federal presidential campaigns and the fact that is it contrary to law to accept monies from another and contribute them to election campaigns.

10, For the reasons stated I deny that I knowingly and willfully violated the federal statutes and regulations cited in the Factual and Legal Analysis


Allison Perz


Barry E. Savage
Attorney for Allison Perz

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2007 JUN - 8 P 3 52

Before the Federal Elections Commission

In the Matter of:

MUR 5871

William J. McElheney III

Response of William McElheney III


- 1, I have reviewed the Factual and Legal Analysis received from the FEC in this matter
- 2, I acknowledge that I did attend the campaign luncheon for Bush-Cheney '04 in Columbus, Ohio in 2004.
- 3, Arrangements to attend the campaign luncheon were made by my wife Allison M. Perz.
- 4, I had no dealings with Mr. Noe in regard to such arrangements.
- 5, I was mistakenly under the impression that any arrangements to attend with Mr. Noe was really as an inducement for people to attend.
- 6, At the time of my attendance I was not aware that a payment by Mr. Noe on behalf of my wife and myself was made, nor was I aware that such a contribution was illegal and not aware that there was a limitation on contributions to federal presidential campaigns.
- 7, If I had been known about the contribution that it was illegal for monies accepted on my behalf to attend the campaign luncheon I would not have participated in the contribution that was made on my behalf and would not have attended the luncheon.


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8, I have no knowledge of any statements being made to myself or my wife at the time of the luncheon that any monies provided to my wife by Mr. Noe were to be treated as loan.

9, I am aware that at the time the investigation of Mr. Noe as to the subject matter of this proceeding that Mr. Noe called my wife and left a message to tell the FBI that if questioned to state that the money was a loan, which was incorrect, and my wife contacted the FBI and provide them with a recording of the statements made by Mr. Noe.

10, For the reasons stated I deny that I knowingly and willfully violated the federal statutes and regulations cited in the Factual and Legal Analysis.


William J. McElheney III


Barry E. Savage
Attorney for William McElheney III

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